

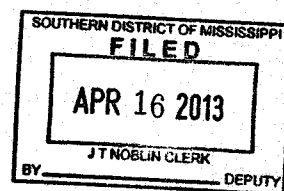
United States District Court For The Southern  
District of Mississippi

case NO. 3:04 cv 393

### Amended Complaint

Now comes the plaintiff in the above styled and  
numbered cause and submits this his amended complaint:

I declare under the penalty of perjury that  
the following is correct.



Amended Complaint

ON or around October 22, 2001, I was arrested and taken to Hinds County Detention Center Raymond. When I was being booked in for housing, I was asked about feeling a threat to my safety and I stated there was a threat to my safety. I did state that one of the persons I had made a statement in a murder case against I knew was being housed at the detention center.

I was taken to housing pod B-1. While on B-1, I saw that the prison supervisors were allowing protective custody inmates to be housed in the side-cells. At that time B-1 was a zone where detainees are housed and questioned before going to other population zones. I reported my fear for my safety while on B-1.

After being classified I was taken to A-3. While on A-3 I was attacked by gang members on multiple occasions because of the statements I had made. I filled grievance forms and protective custody forms out and placed them in the mailbox located on the zone. Around November 2001 the inmates on A-3 put in a fake medical request in my name. When I was called to the doctor, I told him about the threats and attacks. He placed it in a report for my file.

Once Deputy Delonio Sanders let inmates in my

cell on A-3 to attack me.

The attacks continued after the medical visit in November. Sgt. Matlock and Sgt. Thornton would make rounds and I would tell them I was being attacked and they would tell me to fill out protective custody and grievance forms. I would tell them I already had and they would tell me they would see what they can do and I would not hear any more about their help. Sgt. Matlock and Sgt. Thornton are shift supervisors.

In December 2001, after I got tired of being attacked, I called my mother and told her I was going to kill myself. My mother contacted Assistant Public Defender Ricky Soltzeman and he called someone at the jail and reported I was being attacked and that I was threatening to commit suicide. I was placed on suicide watch and taken to see the psychiatrist. I told the doctor about the attacks on A-pod. The escort officer also told the doctor that the inmates from A-pod that were in the medical waiting room were singling me out as a target. The doctor wrote my statements in his medical report and said to place me on protective custody.

I was moved from the suicide tank at booking and placed in a protective custody cell on B-1. B-1 is not a protective custody unit. I believe I was on protective custody until I was moved back to the general population area of B-1. I was taken to see the psychiatrist before being taken off

suicide watch and did report that I feared to be housed on A-pod. All of these statements were in my medical file.

The jail supervisors and housing staff ignored my complaints and moved me back to A-3 in December 2001. The attacks began again. I filed grievance and protective custody forms and again was ignored.

In ~~December~~ February 2002 I was attacked, and the housing floor deputy witnessed the harassment and attack. He called Sgt. Thornton and reported the incident. Sgt. Thornton had me moved for my safety but did not investigate to find out what caused the attack. I was moved to A-1. Some of the inmates that I had gave the statement on had been housed on A-1 and had said my name. The other inmates on A-pod had also began to spread word that I was a "witch" and had told on their "gang brothers" so the threats had began on A-1. I called my mother and told her to have someone to check on me. I was moved to A-4.

Lt. O.C. Davis came and spoke to me about my safety concerns and when I explained to him what happened he laughed saying I told on some guys about a murder now I was locked up for robbery. He did not write a report in front of me, he only placed me on A-4, took my gold suits and gave me a too little blue protective custody

uniform telling me that I was on protective custody because my mother would not stop calling the jail complaining about my safety.

I would see Sgt. Matlock and Sgt. Thorton when they made rounds and would tell them I did not feel safe because the inmates would pass word about me and they could get to me on A-4. A-4 is not a protective custody unit, it is general population for state inmates. Other than myself, Johnny Hilliard was the only protective custody inmate on A-4, when I arrived. Johnny Hilliard got off protective custody, later. I was the only protective custody inmate.

I filled out grievance forms and after a week or so the inmates located me and passed word about my having made a statement against gang members. There were a couple of times when the deputies would have to get between the general population inmates and myself because I would be out for my recreation time and the inmates would somehow get into the room with me. I began to file grievances everyday.

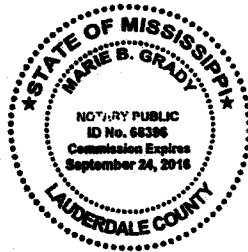
Corp. Brady / Beady was the officer that made rounds collecting the grievance forms. He came and questioned me about my grievances, and when I explained to him what was happening he assured me he would handle it. He did not because I never heard anything. I continued to file grievances daily.

On or around June 26, 2002, the inmates on A-4 got into the room with me after Deputy Delonio Sanders let my door Johnny Hilliard's door and the general population door open at the same time. I was attacked and beaten for a long time before I got away and found Deputy Sanders sitting at the control board that opened the doors.

Relief

I would like twenty million dollars in damages and liability for the injuries.

Sworn before me this 11th day of April 201  
Notary Public: Marie B. Grady



Certificate of Service

I, Roger Johnson, the plaintiff do certify that on this day I have mailed via U.S. Mail, postage pre-paid, a true and correct copy of the above and foregoing document to the following:

U.S. District Court  
P.O. Box 23552  
Jackson, Ms 39225

Damon E. Dore  
P.O. Box 16089  
Jackson, Ms 39236-6089

This the 2<sup>nd</sup> day of ~~April~~ April 2013.

Roger Johnson  
59930  
10641 Hwy 80 West  
Meridian, Ms 39307